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August 5, 2010

Honorable Roanne L. Mann  
United States Magistrate Judge, EDNY  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Nicole Paultre Bell, as Administratrix of the  
Estate of Sean Bell et al. v. City of New  
York, 07 Civ. 2994 (SJ) (RLM)

Your Honor:

As one of the attorneys for the plaintiffs I am writing this letter to provide you with a status report on the above matter. The City has provided the proper closing documents to plaintiffs' counsel. The documents necessitated slight revisions which were handled in an expeditious manner by Mr. Hazan.

I have spoken repeatedly with representatives from Medicaid in reference to potential liens asserted against Mr. Guzman's and Mr. Benefield's settlement proceeds. To date, I have negotiated a dramatic reduction in those liens, and await a final response to our request to waive the liens in their entirety.

Additionally, plaintiffs' counsel have met with the plaintiffs and representatives from a structured settlement company to review different alternatives with our clients. The clients have now been presented with a number of different structured settlement alternatives, so that the settlement funds are used wisely and are protected for the future.

Mr. Guzman and Mr. Benefield are reviewing their alternatives, and are scheduled to meet with us again next week to discuss their final decisions concerning their chosen structure plans.

Ms. Bell has been out of town and is expected back next week. She has been provided with a full set of structured settlement alternatives for the children, and is scheduled to meet with us upon her return next week. I have begun preparing the papers necessary for the estate work, including the wrongful death compromise order, and all documents necessary for the court's approval of the wrongful death action.

Having handled other similar matters in the Federal Court, I respectfully request that we be permitted to submit the wrongful death compromise order to this court for approval. Since this court maintains jurisdiction over this matter, the submission of this order to the Federal Court would help expedite the closing of this matter. If this court so approves, I will submit a full set of the necessary paperwork along with a full detailed listing of all work and services provided by plaintiffs' counsel to your Honor for review.

Very truly yours,



Scott Rynecki